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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS MOTION IN
LIMINE NO. 17**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal information in its September 16, 2017 Motion *in Limine No. 17* and exhibits in support of the same (the “Administrative Motion” or “Waymo’s Motion”), as well as Defendants’ Response to the same and exhibits in support of the same. The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s Motion in Limine No. 17 (“Waymo’s Motion”)	Portions highlighted in green; portions highlighted in blue	Waymo; Defendants
Exhibit 1 to Waymo’s Motion	Entire Document	Waymo and/or Defendants
Exhibit 2 to Waymo’s Motion	Entire Document	Waymo and/or Defendants
Exhibit 3 to Waymo’s Motion	Portions highlighted in green; portions highlighted in blue	Waymo; Defendants
Portions of Uber’s Opposition to Waymo’s Motion in Limine No. 17 (“Uber’s Opposition”)	Portions highlighted in blue	Defendants
Exhibit 50 of Uber’s Opposition	Entire Document	Waymo and/or Defendants
Exhibit 52 of Uber’s Opposition	Entire Document	Waymo and/or Defendants

3. Waymo seeks to seal the portions of Waymo’s Motion in Limine No. 17, Exhibits 1-3, Defendants’ Opposition and Exhibits 50 and 52 because Defendants have designated the information confidential and/or highly confidential. Waymo expects Defendants to file one or more declarations in accordance with the Local Rules.

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven